

December 7, 2009

Ms. Laura Sinram
Senior Campaign Finance Analyst
Federal Election Commission
999 E Street NW
Washington, DC 20463

Dear Ms. Sinram:

The National Republican Congressional Committee (FEC ID# C0075820) is in receipt of your Request for Additional Information dated November 4, 2009 regarding our 2009 July Monthly FEC report.

The line 15 receipts referenced in your letter from Friends of John Boehner, Bill Cassidy for Congress, Dr. Charles Boustany for Congress, Kevin McCarthy for Congress, and Steve Scalise for Congress result not from payments made to these entities, but from payments made to Whitaker Askew. Refunds from these political committees were at exact cost, and thus represented the usual and normal charge.

The line 15 receipt referenced in your letter from Michael J. Minnick was a reimbursement for payroll overpayment on 8/1/08, which was reported on a schedule B for line 21b of our September 2008 monthly FEC report.

The line 15 receipt from Republican Main Street Partnership results not from a payment made to this entity, but from payments made to Kevin McGrann.

Concerning the four line 21b disbursements referenced in your letter to Rachel Hoff, Janice Knopp, Mary Ann Paugh and David Stewart: these individuals made COBRA payments directly to Mamsi Life & Health, but paid excessive amounts. The excessive amounts were part of, and were included in, reimbursements received by the Committee from Mamsi on 4/15/09 and 4/23/09, each in the amount of \$ 1,028.64 (as reported on our May 2009 monthly report); on 6/15/09 in the amount of \$ 2,182.59 (as reported on this July 2009 monthly report); and on 12/2/09 in the amount of \$ 1,668.27 (to be reported on our 2009 year-end report).

With respect to the receipts from the three limited liability companies: these entities are treated as partnerships under IRS rules, and thus these are permissible donations. The memo attribution donors from the IRBSearch donation were provided to the Committee in September 2009, and these names were included on the October 2009 monthly report. However, we have noted that the names on the report were not specifically tied to IRBSearch, and we are amending the October 2009 monthly report to indicate more clearly that the donors represent an attribution from IRBSearch, LLC.

We have now made two requests to the two other entities that they provide us information with respect to the individual members to whom the donations are to be attributed. Should any of the attributions to an individual exceed \$200 aggregate, we will amend our report to reflect the applicable individual attribution(s).

The Committee can as you requested confirm that the contribution from the Committee to Elect Mayor Joseph Digirolamo was received from federally permissible funds, and thus no refund is required. Further, the contribution is not in excess of the \$1,000 annual limit that a non-registered political entity may donate.

With respect to administrative expenditures, the Committee discloses payments in all the categories outlined in your letter as they are incurred with each monthly filing, except for rent. The Committee makes periodic rent and maintenance payments to the Republican National Committee (RNC). The Committee made rent payments to the RNC on 4/13/09 (disclosed on our May 2009 monthly report) and on 7/10/09 (disclosed on our August 2009 monthly report).

Sincerely:

Keith A. Davis, Treasurer
National Republican Congressional Committee
